

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

JALBERT LEASING, INC. d/b/a C&J
TRAILWAYS;
BONANZA ACQUISITION, LLC;
CONCORD COACH LINES, INC. d/b/a
CONCORD TRAILWAYS; and
DARTMOUTH TRANSPORTATION
COMPANY, INC. d/b/a
DARTMOUTH MINICOACH,

SCA

Plaintiffs,

v.

MASSACHUSETTS PORT AUTHORITY,

Defendant.

CIVIL ACTION
NO.

FILING FEE PAID:

RECEIPT # 54436
AMOUNT \$ 50.00
BY DPTY CLK JA
DATE 3/10/04

**MOTION OF WESLEY S. CHUSED FOR LEAVE TO PERMIT
APPEARANCE OF JEREMY KAHN PRO HAC VICE FOR THE PLAINTIFFS**

Wesley S. Chused, attorney for the Plaintiffs, Jalbert Leasing, Inc. d/b/a C&J Trailways, Bonanza Acquisition, LLC, Concord Coach Lines, Inc. d/b/a Concord Trailways and Dartmouth Transportation Company, Inc. d/b/a Dartmouth Minicoach ("Plaintiffs"), pursuant to Local Rule 83.5.3, hereby moves for leave to permit the appearance of attorney Jeremy Kahn of Washington, DC on behalf of the Plaintiffs, *pro hac vice*, in this action. In support of this Motion, Wesley S. Chused states as follows:

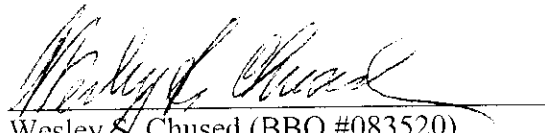
1. I am a member in good standing of the Bar of this Court and I am counsel of record for the Plaintiffs in this action.

2. The certificate of Jeremy Kahn, filed concurrently herewith, shows that (i) he is a member of the Bar in good standing in every jurisdiction where he has been admitted to practice; (ii) there are no disciplinary proceedings pending against him as a member of the Bar in any jurisdiction; and (iii) he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

3. Mr. Kahn is an experienced transportation lawyer, he is particularly familiar with the facts and law relevant to the Plaintiffs' claims for relief in this action and he is best suited to represent the Plaintiffs' interests in this case.

WHEREFORE, Wesley S. Chused prays that the Court grant this Motion to allow Jeremy Kahn to appear *pro hac vice* on behalf of the Plaintiffs, Jalbert Leasing, Inc. d/b/a C&J Trailways, Bonanza Acquisition, LLC, Concord Coach Lines, Inc. d/b/a Concord Trailways and Dartmouth Transportation Company, Inc. d/b/a Dartmouth Minicoach, in this action.

March 10, 2004


Wesley S. Chused (BBO #083520)
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